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FILED US District Court-UT
JUL 17 '24 PM12:09

SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LUIS TREJO-BARAHONA (1),
a/k/a "LUIS TREJO-BARAONA,"

EDGAR ALONSO-ZUNIGA (2),

ALEXIS RIVAS-ARCHULETA (3),

KRISTIN ELLIS (4),

CHARLES CARRINGER (5),

WILLIAM OTTERSTROM (6),

SHANNON EVANS (7),

and

ZACHARY ENNIS (8),

Defendants.

INDICTMENT

Count 1: 21 U.S.C. § 841(a)(1) and 846;
Conspiracy to Distribute Fentanyl (ALL
DEFENDANTS)

COUNT 2: 21 U.S.C. § 841(a)(1); Distribution
of Methamphetamine (TREJO-BARAHONA)

COUNT 3: 21 U.S.C. § 841(a)(1); Distribution
of Methamphetamine (TREJO-BARAHONA)

COUNT 4: 21 U.S.C. § 841(a)(1); Distribution
of Fentanyl (ENNIS)

COUNT 5: 21 U.S.C. § 841(a)(1) and 18 U.S.C.
§ 2; Distribution of Methamphetamine, Aiding
and Abetting (TREJO-BARAHONA, RIVAS-
ARCHULETA)

COUNT 6: 21 U.S.C. § 841(a)(1) and 18 U.S.C.
§ 2; Possession of Fentanyl with Intent to
Distribute, Aiding and Abetting (ELLIS,
EVANS, CARRINGER)

COUNT 7: 21 U.S.C. § 841(a)(1); Distribution
of Fentanyl (TREJO-BARAHONA)

	COUNT 8: 21 U.S.C. § 841(a)(1); Distribution of Fentanyl (TREJO-BARAHONA)
	COUNT 9: 21 U.S.C. § 841(a)(1); Possession of Fentanyl with Intent to Distribute (OTTERSTROM)
	COUNT 10: 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2; Distribution of Fentanyl, Aiding and Abetting (TREJO-BARAHONA, ALONSO-ZUNIGA)
	COUNT 11: 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2; Distribution of Methamphetamine, Aiding and Abetting (TREJO-BARAHONA, ALONSO-ZUNIGA)
	COUNT 12: 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2; Possession of Methamphetamine with Intent to Distribute, Aiding and Abetting (RIVAS-ARCHULETA)
	COUNT 13: 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2; Possession of Fentanyl with Intent to Distribute, Aiding and Abetting (RIVAS-ARCHULETA)
	COUNT 14: 8 U.S.C. § 1326; Reentry of a Previously Removed Alien (TREJO-BARAHONA)
	COUNT 15: 18 U.S.C. § 922(g)(5); Possession of a Firearm by a Person Illegally and Unlawfully in the United States

The Grand Jury charges:

COUNT 1
21 U.S.C. §§ 841(a)(1) and 846
Conspiracy to Distribute Fentanyl

Beginning on an unknown date not later than August 2023 and continuing until November 2023, in the District of Utah and elsewhere,

LUIS TREJO-BARAHONA, EDGAR ALONSO-ZUNIGA, ALEXIS RIVAS-ARCHULETA, KRISTIN ELLIS, CHARLES CARRINGER, WILLIAM OTTERSTROM, SHANNON EVANS, and ZACHARY ENNIS,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree together with each other and with other persons known and unknown to the Grand Jury to commit the following offense against the United States: to knowingly and intentionally distribute Fentanyl, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

The defendants accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

1. It is part of said drug trafficking conspiracy that members of the conspiracy agreed to distribute and did, in fact, distribute N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide ("Fentanyl"), a Schedule II controlled substance, in the Salt Lake City metropolitan area and elsewhere in the District of Utah.

2. It is part of said drug trafficking conspiracy that the distribution of

“Fentanyl” generated significant proceeds.

3. It is part of said drug trafficking conspiracy that LUIS TREJO-BARAHONA utilized cellular telephones to communicate with co-conspirators and customers.

4. It is part of said drug trafficking conspiracy that LUIS TREJO-BARAHONA served as the primary conduit between Mexico-based sources of supply and broker/distributors in the District of Utah.

5. It is part of said drug trafficking conspiracy that, LUIS TREJO-BARAHONA distributed large quantities of Fentanyl to other members of the conspiracy who acted as distributors or brokers, who sold Fentanyl to end-users.

6. It is part of said drug trafficking conspiracy that on August 15, 2023, LUIS TREJO-BARAHONA distributed Fentanyl to a confidential informant working at the behest and under the supervision of law enforcement.

7. It is part of said drug trafficking conspiracy that on August 16, 2023, LUIS TREJO-BARAHONA distributed Fentanyl to a confidential informant working at the behest and under the supervision of law enforcement.

8. It is part of said drug trafficking conspiracy that on August 24, 2023, LUIS TREJO-BARAHONA distributed Fentanyl to a confidential informant working at the behest and under the supervision of law enforcement.

9. It is part of said drug trafficking conspiracy that on November 8, 2023, LUIS TREJO-BARAHONA and EDGAR ALONSO-ZUNIGA distributed Fentanyl to ZACHARY ENNIS. ZACHARY ENNIS, in turn, distributed Fentanyl to J.J. On the

same date, J.J. was the subject of a traffic stop during which Fentanyl was recovered. In a post-Miranda statement, J.J. advised that he/she had acquired the Fentanyl from ZACHARY ENNIS.

10. It is part of said drug trafficking conspiracy that on November 9, 2023, LUIS TREJO-BARAHONA distributed Fentanyl to K.C., a person whose identity is known to the Grand Jury. On the same date, K.C. was the subject of a traffic stop, during which Fentanyl was recovered.

11. It is part of said drug trafficking conspiracy that on November 17, 2023, LUIS TREJO-BARAHONA distributed Fentanyl to SHANNON EVANS, who acted as a broker between LUIS TREJO-BARAHONA and CHARLES CARRINGER.

COUNT 2

21 U.S.C. § 841(a)(1)
Distribution of Methamphetamine

On or about August 17, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, did knowingly and intentionally distribute Methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 3

21 U.S.C. § 841(a)(1)
Distribution of Methamphetamine

On or about October 19, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, did knowingly and intentionally distribute Methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 4

21 U.S.C. § 841(a)(1)
Distribution of Fentanyl

On or about November 8, 2023, in the District of Utah,

ZACHARY ENNIS,

defendant herein, did knowingly and intentionally distribute Fentanyl, a Schedule II, controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 5

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Distribution of Methamphetamine, Aiding and Abetting

On or about November 16, 2023, in the District of Utah,

LUIS TREJO-BARAHONA and ALEXIS RIVAS-ARCHULETA,

defendant herein, did knowingly and intentionally distribute Methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 6

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Possession of Fentanyl with Intent to Distribute, Aiding and Abetting

On or about November 17, 2023, in the District of Utah,
KRISTEN ELLIS, SHANNON EVANS, and CHARLES CARRINGER,
defendants herein, did knowingly and intentionally possess with intent to distribute
Fentanyl, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and
did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and
punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 7

21 U.S.C. § 841(a)(1)
Distribution of Fentanyl

On or about November 17, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, did knowingly and intentionally distribute Fentanyl, a Schedule II
controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §
841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 8

21 U.S.C. § 841(a)(1)
Distribution of Fentanyl

On or about November 21, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, did knowingly and intentionally distribute Fentanyl, a Schedule II
controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §
841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 9

21 U.S.C. § 841(a)(1)
Possession of Fentanyl with Intent to Distribute

On or about November 21, 2023, in the District of Utah,

WILLIAM OTTERSTROM,

defendant herein, did knowingly and intentionally possess with intent to distribute Fentanyl, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 10

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Distribution of Fentanyl, Aiding and Abetting

On or about December 5, 2023, in the District of Utah,

LUIS TREJO-BARAHONA and EDGAR ALONSO-ZUNIGA,

defendants herein, did knowingly and intentionally distribute Fentanyl, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 11

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Distribution of Methamphetamine, Aiding and Abetting

On or about December 5, 2023, in the District of Utah,

LUIS TREJO-BARAHONA and EDGAR ALONSO-ZUNIGA,

defendants herein, did knowingly and intentionally distribute Methamphetamine, a

Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 12

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Possession of Methamphetamine with Intent to Distribute, Aiding and Abetting

On or about December 8, 2023, in the District of Utah,

ALEXIS RIVAS-ARCHULETA,

defendant herein, did knowingly and intentionally possess with intent to distribute Methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 13

21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
Possession of Fentanyl with Intent to Distribute, Aiding and Abetting

On or about December 8, 2023, in the District of Utah,

ALEXIS RIVAS-ARCHULETA,

defendant herein, did knowingly and intentionally possess with intent to distribute Fentanyl, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT 14

8 U.S.C. § 1326
Reentry of a Previously Removed Alien

On or about December 5, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, an alien who on or about October 30, 2020 and January 19, 2012, was excluded, removed, and deported from the United States, did knowingly reenter and was found in the United States in the District of Utah, having not obtained the consent of the Secretary of the United States Department of Homeland Security to reapply for admission into the United States; all in violation of 8 U.S.C. § 1326(a).

COUNT 15

18 U.S.C. § 922(g)(5)

Possession of a Firearm by a Person Illegally and Unlawfully in the United States

On or about December 5, 2023, in the District of Utah,

LUIS TREJO-BARAHONA,

defendant herein, knowing he was illegally and unlawfully in the United States, knowingly possessed a firearm, to-wit: a Ruger pistol, model EC9S, and that firearm was in and affecting commerce, in violation of 18 U.S.C. § 922(g)(5)(A).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS

United States Attorney

SIRENA MILLER WISSLER

Assistant United States Attorney